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VIA ELECTRONIC FILING

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC, 20554

Re: NOTICE OF EX-PARTE COMMUNICATION

***In the Matter of Reliability and Continuity of Communications Networks, Including
Broadband Technologies, PS Docket No. 11-60***

Dear Ms. Dortch,

On September 10, 2018, Joe Marx and I, (both of AT&T) spoke via conference call with Renee Roland and Robert Finley of the FCC's Public Safety and Homeland Security Bureau, Pramesh Jobanputra of the Wireless Telecommunications Bureau, and Rebekah Douglas of the Wireline Competition Bureau, regarding various issues raised in the ongoing, above-referenced proceedings. No materials were used or distributed during this discussion.

During this conversation, we discussed the Commission's proposal to incorporate wireline providers into the CTIA Wireless Resiliency Cooperative Framework ("Framework") for the purpose of sharing information regarding restoration of backhaul to cell sites. Consistent with our publicly filed comments in this proceeding, we expressed our concerns that such a proposal would be unnecessarily redundant, given the existing information-sharing processes that take place within the National Coordinating Center of Communications and Emergency Support Function #2 efforts under the National Response Framework. Moreover, we noted that information related to service availability and operating status of network facilities are typically covered by service level agreements between wireless service providers and their backhaul providers, and that any supplementary activity on this front risks interfering or creating conflicts with existing contractual agreements.

We also discussed the FCC's ongoing efforts, consistent with the recommendations of the GAO, to develop performance metrics or some alternative means to gauge the effectiveness of the Framework. In AT&T's experience, because no two disasters are the same, it is difficult to develop metrics that yield consistent and meaningful conclusions. This task is made even more difficult when these performance metrics do not account for significant factors that are external to the wireless industry and the operation of the Framework, such as the strength of the storms

themselves, the availability of commercial power, or whether a population has been ordered to evacuate or shelter in place. In this regard, Verizon's alternative proposal that the Framework signatories could provide the Commission with a confidential narrative regarding its experience with the Framework during the previous hurricane season is certainly an improvement over any approach that relies solely on comparing data-points between years, but AT&T is unable to commit to such an approach at this time without further details regarding the FCC's expectations of such an approach.

In accordance with Section 1.1206(b) of the Commission's rules, I am filing a copy of this letter in the above-referenced dockets.

Should you have any questions regarding any of the above, please feel free to contact me directly.

Sincerely,

A handwritten signature in black ink, appearing to read "J. M. F." with a stylized flourish at the end.

Cc (via e-mail):

Ms. Renee Roland
Mr. Robert Finley
Mr. Pramesh Jobanputra
Ms. Rebekah Douglas